

March 6, 2018



Y O L O C O U N T Y
FLOOD CONTROL &
WATER CONSERVATION
DISTRICT

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100
Emailed: waterrightsfees@waterboards.ca.gov

Re: Water Rights Fees for Temporary Water Rights Permits for Underground Storage

To Whom It May Concern:

The Yolo County Flood Control and Water Conservation District (District) has participated in the State Water Board's temporary water rights permits for underground storage program (Program) for the past three years. The Program has been flexible, streamlined, and economical. The District's participation has inspired creative management actions for sustainable groundwater management in the Yolo Subbasin and the Program has greatly benefitted the groundwater users. The District has funded the temporary permit fees without being the direct beneficiary or beneficial user of the recharge.

Unfortunately, District staff were unable to attend the February 8, 2018 Water Rights Fee Stakeholder Meeting that the Division of Water Rights staff held to discuss the five preliminary fee structure ideas for temporary water rights permits for underground storage. However, the District strongly objects to the proposed fee structures that would increase the baseline fee by at least 20 times what it currently is for diverters requesting 1,000 acre-feet or less. The exponential increase in fees for diverting greater than 1,000 acre-feet would make participation by water districts and rural landowners financially unfeasible.

Tim O'Halloran
General Manager

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These temporary permits are too dependent on precipitation conditions to allow the State Water Board to charge "based on the total annual amount of diversion sought by the application". The existing fee structure which allows payment based on actual diversions is much more appropriate for the nature of the permits and basis of water use fees in California. For the District's 2018 temporary permit, we paid the \$100 base fee and could potentially owe an additional \$620 if we divert the total requested diversions; however, given weather conditions we will likely have zero

diversions during the permitting period. For the same diversion request under the proposed Option 2 (5% of application fee), the District would have to pay an additional \$25,845 for zero water recharged to underground storage.

If the fees are increased to the proposed fee structure ideas, it will be to the detriment of the Program. Additionally, the potential for Groundwater Sustainability Agencies to integrate this Program into the implementation of Sustainable Groundwater Management Act (SGMA) will be limited and landowner collaboration will be difficult to incentivize.

Please consider an alternative fee schedule that is financially feasible and more equitable than proposed or retain the current fee (Option 1).

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "Kristin J. Sicke". The signature is fluid and cursive, with the first name "Kristin" and last name "Sicke" being the most prominent parts.

Kristin Sicke
Assistant General Manager